

United States Courts
Southern District of Texas
FILED

MAY 05 2025

Nathan Ochsner, Clerk of Court

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Rachael Griffin-EL, in propria persona, sui juris,
Plaintiff,
v.

25CV2013

JPMorgan Chase Co., and **Jamie Dimon**, individually in his corporate capacity
Franklin Credit Management Corporation, and
Thomas J. Axon, individually and in his corporate capacity,
Defendants.

Civil Action Number (to be assigned)
Criminal Allegation Referral Attached

**COMPLAINT FOR DAMAGES, DECLARATORY RELIEF, INJUNCTIVE RELIEF, AND
CRIMINAL REFERRAL**

JURY TRIAL DEMANDED

I. INTRODUCTION

Plaintiff, Rachael Griffin-EL, brings this action against JPMorgan Chase Co and its CEO Jamie Dimon, and Franklin Credit Management Corporation and its CEO Thomas J. Axon, for knowingly engaging in fraudulent and unlawful debt collection practices, mail fraud, misrepresentation of identity, unlawful attempts to collect an invalid debt, and asserting baseless claims to her real property in violation of federal and state law. Defendants' acts and omissions were deliberate, fraudulent, and executed with reckless disregard for Plaintiff's constitutional rights, contractual protections, and property interests.

II. JURISDICTION AND VENUE

1. Jurisdiction is conferred upon this Court under:

- o **28 U.S.C. § 1331** (federal question),
- o **28 U.S.C. § 1332** (diversity jurisdiction),
- o **15 U.S.C. § 1692k(d)** (FDCPA),
- o and **28 U.S.C. § 1367** (supplemental jurisdiction for state law claims).

2. Venue is proper in this district pursuant to **28 U.S.C. § 1391** because the property in question is located in Houston, Texas, and the unlawful acts occurred in this district.

III. PARTIES

3. **Plaintiff** is a natural person, Moorish American national, and rightful holder of equitable title to the real property located at 703 Deveron Lane, Houston, Texas [Zip Exempt].
4. **Defendant JPMorgan Chase Co., Franklin Credit Management Corporation** is a foreign corporation operating in the United States, claiming to be a creditor and debt servicer.
5. **Defendant Jamie Dimon** CEO and acting agent of JPMorgan Chase Co. and **Thomas J. Axon** is the CEO and acting agent of Franklin Credit Management Corporation, responsible for all corporate policies and communications related to debt enforcement.

IV. FACTUAL ALLEGATIONS

6. On or about December 9, 2024, Plaintiff received an instrument titled "Mortgage Statement" claiming an alleged debt under account number 0696921980 and 1000002795
7. Said instrument was unsigned, failed to identify a lawful creditor, contained no valid contract, no original promissory note, and made false representations of indebtedness.
8. The statement was addressed to the artificial legal fiction "RACHAEL GRIFFIN / RACHEL GRIFFIN," which is not the name of the living Plaintiff and constitutes identity misrepresentation.
9. Plaintiff has never entered into a loan agreement with Defendants and has demanded, to no avail, original documents proving holder-in-due-course status and lawful title to her real property.
10. Defendants failed to validate the alleged debt as required by law and instead continued collection activity.
11. Defendants have placed her real property in jeopardy and reported the fraudulent debt to consumer reporting agencies, injuring Plaintiff's credit and peace of mind.

V. CAUSES OF ACTION

COUNT I: VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT (FDCPA)

15 U.S.C. § 1692 et seq.

12. Defendants falsely represented the legal status of a debt, failed to verify the debt, and used deceptive and misleading means to collect an alleged obligation not owed by Plaintiff.

COUNT II: MAIL FRAUD

18 U.S.C. § 1341

13. Defendants knowingly caused to be delivered through the mail a false debt collection statement to obtain money under false pretenses, constituting criminal mail fraud.

COUNT III: FRAUDULENT MISREPRESENTATION

14. Defendants knowingly issued false claims of indebtedness without verifying or substantiating any contract, consideration, or authority to collect.

COUNT IV: IDENTITY MISREPRESENTATION

15. By using the artificial name "RACHAEL GRIFFIN / RACHEL GRIFFIN," Defendants attempted to bind Plaintiff to obligations not her own, in violation of her due process and property rights.

COUNT V: SLANDER OF TITLE / QUIET TITLE

16. Defendants have made false claims to title or lien over Plaintiff's ancestral estate located at 703 Deveron Lane, Houston, Texas, despite no proof of allodial or aboriginal title.

COUNT VI: CONSTITUTIONAL VIOLATIONS

U.S. Const. Art. I, §10; Art. VI; 5th and 14th Amendments

17. Defendants attempted to compel performance in unconstitutional tender (Federal Reserve Notes) and violated Plaintiff's due process rights by asserting obligations absent lawful cause.

COUNT VII: INJUNCTIVE AND DECLARATORY RELIEF

18. Plaintiff seeks a declaration that no enforceable debt exists and that Defendants have no right to collect or report said debt.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following:

1. **Declaratory Judgment** that no valid debt exists and all actions by Defendants are void ab initio.
2. **Permanent Injunction** barring Defendants from any further collection, reporting, or claims to Plaintiff's real property.
3. **Actual Damages** pursuant to 15 U.S.C. § 1692k(a)(1).
4. **Statutory Damages** of up to \$1,000 under 15 U.S.C. § 1692k(a)(2)(A).
5. **Punitive Damages** in the amount of \$250,000 for willful fraud, misrepresentation, and emotional distress.
6. **Disgorgement** of any profits or interests derived from the attempted enforcement of the fraudulent debt.
7. **Quiet Title Order** removing any cloud from the property located at 703 Deveron Lane, Houston, Texas.
8. **Costs of Suit** including filing fees, notary expenses, and mailing.
9. **Referral to U.S. Attorney's Office** for criminal prosecution under 18 U.S.C. § 1341.
10. **Any other relief** the Court deems just and proper.

VII. DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,


Rachael Griffin-El

In Propria Persona, Sui Juris

All Rights Reserved, UCC 1-308

C/o 703 Deveron Lane

Houston, Texas [Zip Exempt]

State of Texas
County of Harris
Sworn to and subscribed before me on
the 4th day of May, 2025, by
Rachael Griffin-El



